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WESTERN DISTRICT OF TEXAS  
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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS

\_\_\_\_\_  
JORGE L. QUINTANA, SR.,

Plaintiff,

TRIAL BY JURY

- against -

CIVIL ACTION NO.

**SA22CA0706 OG**

JOHN PATRICK LOWE,  
EX-BANKRUPTCY TRUSTEE, -  
RAYMOND RAMOS AND MARIA C. RAMOS,  
HUSBAND AND WIFE.

Defendants.  
\_\_\_\_\_

VERIFIED COMPLAINT WITH WITNESSES

I. The Parties of this Complaint

Plaintiff:

Jorge L. Quintana, Sr.  
Corso Sicilia 29  
Motta San't Anastasia, CT 95040 Italy

Defendants:

John Patrick Lowe, Esq.  
Ex-Bankruptcy Chapter 7 Trustee  
2402 East Main Street  
Uvalde, Texas 78801  
Suing in all his private and/or allegedly official capacities.

Raymond Ramos  
Maria C. Ramos  
358 County Road 4647,  
Dunlay, Texas 78861

II This Court Jurisdiction

This Court has subject matter jurisdiction under 28 U.S.C. §1331 and §1332 under the United States Constitution, United States Federal Laws and Treaties is a federal question case by the diversity of citizenship and the local and state laws of the States of Texas and New York. All Parties are United States citizens.

III Rule 8 Statement

Upon the actual admission of the defendant John Patrick Lowe that the Plaintiff at the time of the filing of the bankruptcy proceeding was a natural and actual resident of the State of New York and only receive that time cancer treatment in the State of Texas and have a prior-filed divorce in the State of Texas; County of Medina of his ex-wife Libertad resident of the State of Texas.

During the conflicted bankruptcy process and upon defendant John Patrick Lowe upon his own admission to use the Quintanas bankruptcy process for his own enrichment by conspiracy with the bankruptcy judge to violate all and any other laws to obtain any and all real and personal protected or not of the real and/or personal property of the Quintanas.

Discovery will be shown in detail all violations and damages caused by defendant John Patrick Lowe.

The evidence also will be shown that on August 29, 2020, John Patrick Lowe filed in the Medina County Clerk's Office a deed for Lot 19, Block A Medina River West Subdivision the Quintanas real estate in the State of Texas selling the Quintanas homesteads to Raymond Ramos and his wife Maria C. Ramos.

John Patrick Lowe admitted that conspiracy to sell the Plaintiff's New York homestead making the Plaintiff a cancer patient homeless. John Patrick Lowe also admitted that stole a Ford 350 Truck and a Jaguar even in today day the Plaintiff has no notice of where John Patrick Lowe hide or what do with those vehicles and the Plaintiff in this Complaint request actual replacement today value of those two (2) vehicles including all the personal property that without the Plaintiff permission and without knowledge. John Patrick Lowe stole and remove from the New York real estate property located at 23 Railroad Avenue, Stamford, New York, all personal property even John Patrick Lowe does not been the owner of the real or personal property at the time of removal.

Due to that Plaintiff moved to the State of Texas to avoid being homeless and all defendants admit that without eviction changing the lock of the Texas property and stealing all personal property of the Plaintiff that was located in Texas...The Texas next-door neighbor has videos and will be testifying in this Court that Raymond and his wife Maria Ramos selling the Plaintiff's personal property in from of the house in a yard sale for the defendant's own benefits and without knowledge or authorization of the Plaintiff. The Texas property constitutes four bedrooms and two bathrooms fully furnished, including all business restaurant equipment and all store fixtures of the old

store including lots of construction materials that were the plan to build a new home and a jacuzzi now all stolen by all the defendants.

AS THE FIRST CAUSE OF ACTION

Plaintiff requests an order by this Court, mandating the defendant John Patrick Lowe to pre-pay all rental car expenses from the filing date of this Complaint until the Court order John Patrick Lowe to replace the Ford 350 Truck and the Jaguar stolen by him and/or anyone conspiracy with him with a present exact up to date [2022] same vehicles or the new model of this vehicles. Discovery will show the evidence.

AS THE SECOND CAUSE OF ACTION

The evidence clearly shows that Plaintiff was in all areas and before the 180 days resident of the state of New York with all rights and privileges of the State of New York laws and all constitutionals laws as well rights to his New York homestead as the date of the filing from divorce as all rights to Plaintiff personal property rights, nothing on the law provide the rights to the defendant, John Patrick Lowe, to steal and/or donate stolen Plaintiff property to anyone for example question to John Patrick Lowe (Where is Plaintiff refrigerator, stove, washer and dryer machine that was located at the New York homestead located at 23 Railroad Avenue Stamford, New York?), etc.

Plaintiff requests full replacement and all costs of any real property stolen and/or personal property at today's present replacement value. That includes example TV, computers, furniture, clothing, watches, etc. Discovery will show the evidence.

AS THE THIRD CAUSE OF ACTION

Defendant John Patrick Lowe evidently admitted that his criminal activities in New York create that the Plaintiff becomes a homeless individual at the same time fighting the illness of cancer, not stopping John Patrick Lowe from using the law for his own enrichment with the help and conspiracy or the court system also decide to in any manner steal the Texas real property that upon the divorce will be to Libertad.

Mrs. Libertad on the time travel and call the Plaintiff to be on the real property to avoid sleeping on the street as a homeless person.

On August 29, 2020, defendant John Patrick Lowe sold the Texas Libertad homestead to the defendants Raymond Ramos and his wife Maria C. Ramos, the Ramos evidentiary admitted that stealing all personal, construction materials, tools, commercial kitchen equipment of the Plaintiff on the home that was fully furnished and decorate including the violations of changing the locks, and now with witnesses present evidence that the Ramos selling the stolen property even in front of the house as a yard-sale, Plaintiff request that the defendants Raymond Ramos and his wife Maria C. Ramos full replacement at today present value all stolen property including hundred of thousands of dollars in commercial kitchen equipment. John Patrick Lowe admitted under all the responsibility of his duties under his private and any allegedly official capacities to participate in all those criminal acts.

The Texas house constitutes four bedrooms, two bathrooms, a living room, a dining room, and a kitchen, fully furnished and decorate. Plaintiff requested a full present replacement.

Plaintiff has never been evicted and/or foreclosure of any rights to his personal and/or business property.

IV. Relief Requested

1. Defendant John Patrick Lowe to return the Ford F-350 in certified guaranty working condition or by actual replacement or the same vehicle (2022 Ford F-350) that today's present value is around \$80,000.00 dollars;
2. Defendant John Patrick Lowe to return the Jaguar in certified guaranty working condition or by actual replacement of the same vehicle (2022 Jaguar) that today's present value is around \$60,000.00 dollars;
3. All Defendants admit they were stealing all Plaintiff's clothing (including the Plaintiff's underwear, watches and shoes...all clothing in New York and Texas) the defendants cannot deny these facts; Plaintiff claims \$25,000.00 for all the stolen clothing;
4. Plaintiff's demand and request order by this Court for all the stealing house furniture, including TV, sofa, etc... \$500,000.00 to recover all the loss of personal houseware and business equipment and upon the facts that cannot disputed by all defendants. All material facts will be presented upon discovery, since the defendant, John Patrick Lowe do needs to have the exact inventory of all the personal items of the Plaintiff and his family were removed from the New York and Texas homestead and find the exact number in the docket of the past Bankruptcy case where John Patrick Lowe details those items that John Patrick

Lowe steals from Plaintiff as the same Raymond and his wife Maria C. Ramos stealing from the Plaintiff's Texas homestead;

5. Plaintiff demand and respectfully request order by the jury and/or the Court for \$2,000,000.00 dollars for punitive and extra damages and the responsibility of each defendant upon the facts that they know that the Plaintiff was suffering the illness of cancer and still suffering from homelessness and emotional damages from years as well strong depression and instability when all defendants conspiracy to steal all real and personal property of the Plaintiff in all ways or perform as the discovery and irrevocable evidence, in this case, will show.

#### V. Certification

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this Complaint: (i) is not being, presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (ii) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (iii) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery and (iv) the Complaint otherwise complies with the requirements of Rule 11.

Respectfully submitted,

By: 

/s/ Jorge L. Quintana, Sr.

Jorge L. Quintana, Sr.  
Corso Sicilia 29  
Motta San't Anastasia, CT 95040, Italy  
email: [princejorge.it@gmail.com](mailto:princejorge.it@gmail.com)